

**UNITED STATES DISTRICT COURT
IN AND FOR DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL INSURANCE
COMPANY,

Plaintiff,

y.

INDIAN RIVER SCHOOL DISTRICT, *et al.*

Defendants.

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C.A. No. 06-246-JJF

JOINT MOTION TO EXTEND DEADLINES

Plaintiff Graphic Arts Mutual Insurance Company (“Graphic Arts”) and Defendants Indian River School District, Indian River School Board, Harvey L. Walls, Mark A. Isaacs, John M. Evans, Richard H. Cohee, Gregory A. Hastings, Nina Lou Bunting, Charles M. Bireley, Donald G. Hatier, Reginald L. Helms, M. Elaine McCabe, Lois M. Hobbs, and Earl J. Savage (collectively “IRSD”), by counsel, move this Court to enter the attached order, pursuant to Paragraph 4(g) of the Rule 16 Scheduling Order.

Graphic Arts filed this action to, *inter alia*, determine its rights and obligations under the insurance contract for the *Dobrich* Action. IRSD filed a counter-claim alleging breaches and anticipatory breaches of the insurance contract. Graphic Arts and IRSD now request, by this Motion, an extension of the currently pending deadlines for sixty days to allow the parties to participate in settlement discussions and potentially a formal mediation in an attempt to finally resolve the dispute.

Specifically, the parties request an extension of the deadlines for producing expert reports, amendment of pleadings, dispositive motions, and the pre-trial conference as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by September 23, 2007; from the defendant(s) by October 6, 2007;
- All motions to amend the pleadings shall be filed on or before October 24, 2007;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before November 4, 2007. Briefing shall be pursuant to D. Del. LR 7.1.2;
- A pre-trial conference as scheduled by the Court, on or after December 4, 2007.

As of the filing of this motion, the parties have exchanged initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1), written discovery requests and responses, and have taken some, but not all depositions in the matter. Pursuant to Local Rule 16.4, counsel certify that a copy of this motion has been sent to their respective clients.

WHEREFORE, Graphic Arts and IRSD respectfully request that this Court enter the attached Order.

Respectfully submitted,

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Dated: July 20, 2007

UNITED STATES DISTRICT COURT
IN AND FOR DISTRICT OF DELAWARE

GRAPHIC ARTS MUTUAL INSURANCE)	
COMPANY)	
)	
Plaintiff,)	C. A. No. 06-246-JJF
)	
v.)	
)	
INDIAN RIVER SCHOOL DISTRICT, <i>et al.</i>)	
)	
Defendants.)	

STIPULATED ORDER

And now, on this ____ day of July, 2007, upon consideration of the parties' Joint Motion to Extend Deadlines, it is hereby ORDERED and DECREED as follows:

- Reports from retained experts required by Fed. R. Civ. P. 26(a)(2) are due from the plaintiff(s) by September 23, 2007; from the defendant(s) by October 6, 2007;
- All motions to amend the pleadings shall be filed on or before October 24, 2007;
- Any case dispositive motions, pursuant to the Federal Rules of Civil Procedure, shall be served and filed with an opening brief on or before November 4, 2007. Briefing shall be pursuant to D. Del. LR 7.1.2;
- The pre-trial conference presently scheduled for October 4, 2007, at 1:00 p.m. is hereby rescheduled for _____ at _____.

Judge Joseph J. Farnan, Jr.